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Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA, DIVISION 5

In Re:)	Chapter 13
SABRINA Q. PARKER,)	Bankruptcy No. 12-50405
)	
)	
)	
Debtor.)	
_____)	HON. STEPHEN L. JOHNSON

MOTION TO MODIFY CHAPTER 13 PLAN

The Debtor(s) respectfully request that the Court modify the Chapter 13 plan as follows:

X 1. With respect to the monthly plan payments of \$ 43.00 for 22 months then \$1411 thereafter _____ those payments shall:
X be suspended for the months of payments will be suspended such that the plan is deemed current as of December 2016.
_____ be increased to \$ _____, effective _____
X be decreased to \$ 100.00, effective January 2017

2. With regard to secured claims:

_____ to treat the claim(s) of additional creditors as secured, as follows:

Creditor Name	Value of Collateral	Monthly Pmt (if fixed)	Interest Rate (must be specified)
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Creditor Name	Value of Collateral	Monthly Pmt (if fixed)	Interest Rate (must be specified)
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_____ to treat as unsecured, the claims of the following creditors which were previously treated as secured.

X 3. With regard to general unsecured claims, to change the dividend paid:
X from a percentage plan of 14% % to a percentage plan of 0%
 _____ from a pot plan* of \$ _____ to a pot plan* of \$ _____
 _____ from a percentage plan at _____ % to a pot plan* of \$ _____
 _____ from a pot plan* of \$ _____ to a percentage plan at _____ %
 * A pot plan provides for a sum (as specified above) to be distributed pro rata, in amounts determined after allowed administrative, secured and priority unsecured claims are paid. The plan payments will continue at the highest monthly payment provided in the confirmed plan, as it may have been modified, as necessary to pay all allowed administrative, secured and priority unsecured claims within sixty (60) months of the date the first plan payment was due.

X 4. Other modifications: A portion of Section 7 of the fourth amended plan filed on November 7, 2013 (Docket #63) and confirmed on November 27, 2013 (Docket #70) should be deleted. The portion that should be deleted provides that unsecured creditors should receive no less than \$48,910.31.

5. Debtor's reasons for requesting the above modification are: The plan payment was sufficient to cover the arrearages on the first mortgage. However once a loan modification was approved, Counsel for the debtor didn't modify the plan to lower the plan payment since the arrearages were built into the modification.

6. The plan, if modified, would be completed within sixty (60) months from the date the first payment is due.

1 WHEREFORE, the Debtor(s) request that the Court modify the Chapter 13 plan as set
2 forth above.

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4 Dated: 12/13/2016
Rev. 2/05

/s/ Renee C. Mendoza

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